

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.

Victor LINDSEY

Case No. Case: 2:24-mj-30357
Assigned To : Unassigned
Assign. Date : 8/21/2024
Description: COMP USA V.
LINDSEY (KB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 20, 2024 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 922(g)(1)	Felon in possession of a Firearm


This criminal complaint is based on these facts:
See attached Affidavit

☐ Continued on the attached sheet.


Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: August 21, 2024

City and state: Detroit, MI


Complainant's signature

Sami Rasmussen, Special Agent ATF
Printed name and title


Judge's signature

Hon. Anthony P. Patti, U.S. Magistrate Judge
Printed name and title

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

1. I, Samantha Brockmiller-Rasmussen, being first duly sworn,
hereby state:

INTRODUCTION

2. I am an “investigative or law enforcement officer of the United States” within the meaning of Section 2510(7) of Title 18, United States Code, that is, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Section 2516, Title 18, United States Code. I have been employed by the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), United States Department of Justice, as a Special Agent since December of 2023. I completed the Federal Law Enforcement Training Center Criminal Investigator Training Program and the ATF Special Agent Basic Training Program in Glynco, Georgia.

3. Prior to becoming a Special Agent with ATF, I was an Intelligence Analyst with the Oakland County Sheriff's Office for approximately one year. I obtained a Master of Science degree in

Criminology and a Bachelor of Science degree majoring in Criminology and Criminal Justice and Psychology from Florida State University.

4. I am a Special Agent in Group IV, which is responsible for conducting investigations related to violent crime and/or gangs. During my employment, I, and Agents assigned to this investigation, have conducted and/or participated in numerous criminal investigations involving the illegal possession, use, and sale of firearms, drug trafficking violations, fraud, and criminal street gangs.

5. This affidavit is made in support of an application for a criminal complaint for Victor LINDSEY.

6. I have probable cause to believe that LINDSEY, who knew he was a convicted felon, knowingly possessed a firearm, which traveled in interstate commerce, in violation of 18 U.S.C. § 922(g)(1).

7. I make this affidavit based on my participation in this investigation, interviews conducted by myself and other law enforcement agents, reports from other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience.

8. The information in this affidavit is for the limited purpose of establishing probable cause and does not contain all details or all facts relating to this investigation.

PROBABLE CAUSE

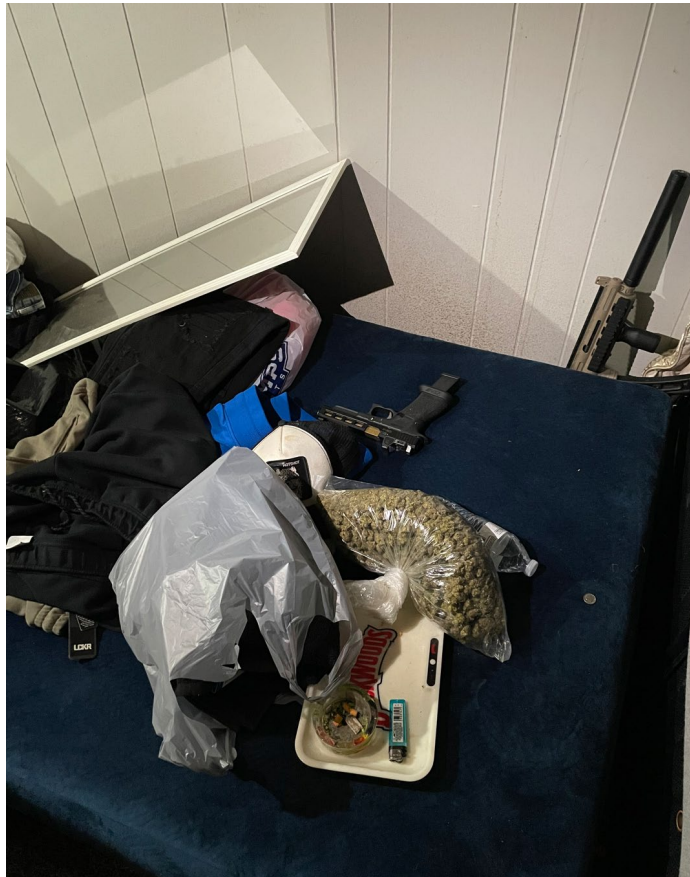
9. On August 19, 2024, I obtained a federal search warrant for a residence located in Detroit, Michigan. On August 20, 2024, the ATF Special Response Team (“SRT”) with assistance from ATF agents, Department of Labor – Office of Inspector General (“DOL-OIG”), and the Detroit Police Department (“DPD”), executed the warrant. LINDSEY was detained in the backyard driveway. Two other individuals were encountered in the living room.

10. After the residence was secured, a systematic search was conducted, and the following items were recovered from the basement bedroom:

- a. One Ruger, model 5.7, 5.7 caliber pistol containing sixteen rounds of ammunition in the magazine and one additional round in the chamber.
- b. One Glock, 9mm pistol with a black and gold Zev slide, loaded with an extended magazine.

- c. One American Tactical, Model GSG-16, .22LR HV caliber rifle with the safety disengaged with one round of ammunition in the chamber and a magazine containing assorted ammunition.
- d. Two boxes of assorted ammunition recovered in the basement ceiling.
- e. One Canik, Model SFX Rival, 9mm pistol affixed with a light attachment and containing fourteen rounds of ammunition and one additional round in the chamber.
- f. One black Canik firearms box containing four firearm magazines.
- g. Assorted ammunition.
- h. One black nylon bag containing assorted ammunition and numerous magazines.
- i. Approximately four thousand dollars located near LINDSEY's identification card.
- j. A wallet with identification in the name of Victor LINDSEY.
- k. Automobile paperwork and bank documents in the name of Victor LINDSEY.

- l. Additionally, in the garage, agents recovered one Kalashnikov, Model K12, 12-gauge shotgun containing nine rounds of 12-gauge ammunition.
- m. The below image depicts some of the above-described evidence recovered in the basement bedroom.



11. Based upon my review of the personal property in the basement bedroom, it appeared the bedroom belonged to LINDSEY.
12. On or about August 18, 2024, I completed a review of surveillance footage between approximately August 13, 2024, and

August 20, 2024, at the residence. I observed LINDSEY enter and exit the residence multiple times using the side door that opens to the driveway of the residence. In addition, agents observed LINDSEY entering the residence utilizing a key to unlock the door.

13. I reviewed LINDSEY's computerized criminal history and court records which revealed the following felony convictions.

- a. On or about December 13, 2006, LINDSEY was convicted in the Third Circuit Court Criminal Division, Wayne County, Michigan of Controlled Substance-Delivery/Manufacture-Ecstasy/MDMA, Controlled Substance-Delivery/Manufacture-Marijuana, Felon in Possession of a Firearm, and Felony-Firearm.

14. On August 20, 2024, S/A Mary Behler, S/A Colon, and I conducted a recorded interview with LINDSEY. Agents advised LINDSEY of his Miranda Rights to which he acknowledged and agreed to speak with agents without an attorney present. During the interview, LINDSEY stated his fiancé "put him out" and therefore LINDSEY brought his items, including clothing and documents, and placed them in the basement the evening prior. LINDSEY denied

possession of the firearms. Additionally, LINDSEY acknowledged his previous felony conviction and being prohibited from possessing firearm.

15. On August 20, 2024, I contacted Special Agent Michael Jacobs, an ATF Interstate Nexus Expert, and provided him a description of the firearms recovered from the basement. Based upon the description, Special Agent Jacobs advised that the firearms are firearms as defined under 18 U.S.C. § 921. He also advised that the firearms were manufactured outside of the state of Michigan after 1898 and therefore had traveled in and affected interstate commerce.

CONCLUSION

16. Probable cause exists that Victor LINDSEY, knowing that he was a prior convicted felon, knowingly possessed the above-described firearms, which have previously traveled in foreign or interstate commerce. Therefore, probable cause exists that Victor LINDSEY committed violations of 18 U.S.C. § 922(g)(1), within the Eastern District of Michigan.

Respectfully submitted,



Samantha Brockmiller-Rasmussen
Special Agent
Bureau of Alcohol, Tobacco, Firearms
and Explosives

Sworn to before me and signed in my
presence and/or by reliable electronic means.



HON. ANTHONY P. PATTI
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF MICHIGAN

Date: August 21, 2024